

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 3:18cr04
)	
RICHARD WINCE,)	
)	
<i>Defendant.</i>)	
_____)	

STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Count One of the Information are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. From in or about October 2015, continuing to in or about April 2017, in the Eastern District of Virginia, defendant, RICHARD WINCE, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 923(a).

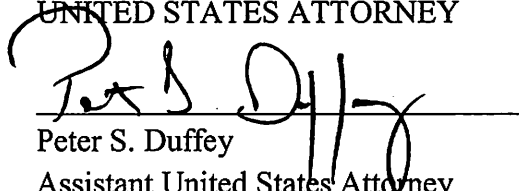
2. During the relevant time period as specified in the Information, WINCE willfully made repetitive purchases of firearms, as defined in Title 18, United States Code, Section 921(a)(3), from a licensed dealer, and then re-sold them to various persons, as a regular course of business, with the principal objective of pecuniary gain.

3. At no time during the relevant time period specified in the Information was WINCE licensed to deal, import, or manufacture firearms.

4. The parties agree and stipulate that for sentencing purposes, between the dates of October 27, 2015, and April 4, 2017, WINCE's offense conduct involved at least 8, but no more than 24 firearms. The parties acknowledge that this stipulation is not binding on the sentencing judge.

DANA J. BOENTE
UNITED STATES ATTORNEY

By:


Peter S. Duffey

Assistant United States Attorney

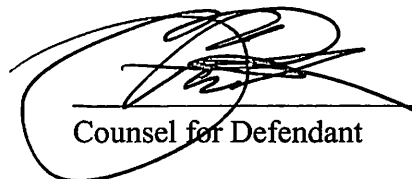
I have consulted with my attorney regarding this Statement of Facts and committed the acts described herein knowingly, intentionally, willfully and without legal justification or excuse, with the specific intent to do that which the law forbids, and not by mistake, accident, or any other reason. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

11/7/17
Date


Defendant

I am counsel for defendant, RICHARD WINCE. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

11 07 17
Date


Counsel for Defendant